

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL CONTRACT 59 (MC2013-52)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2013-66

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(June 16, 2016)

The United States Postal Service hereby moves for temporary relief, to allow the existing contract in this docket to remain in effect for thirty (30) additional days. The customer whose competitive product rates were established in this docket wishes to renew its commitment to sending large volumes of Priority Mail for the next year at negotiated rates. By the terms of the contract filed in this docket, the current rates will expire on June 23, 2016.

The Postal Service and the customer have been working cooperatively on an amendment to extend the term of the contract for one additional year. The Postal Service expects to receive a signed amendment back from the customer within the next week; however, the Postal Service will not be able to file the amendment in time for the Commission to be able to complete its review prior to June 23, 2016. Therefore, the Postal Service respectfully requests that the Commission grant a thirty (30) day extension to allow the existing contract to remain in effect, or until such time as the amendment has been approved by the Commission. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity,

the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for thirty additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.

Chief Counsel, Pricing and Product Support

Elizabeth A. Reed

475 L'Enfant Plaza West, S.W.

Washington, D.C. 20260-1137

(202) 268-3179, Fax -6187

elizabeth.a.reed@usps.gov

June 16, 2016